

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CAVOUR NDAM,

Plaintiff

v.

Civil Action No. 1:21-cv-01258

DEUTSCHE LUFTHANSA
AKTIENGESELLSCHAFT, *et al.*,

Defendants.

MOTION TO DISMISS THE COMPLAINT
FOR FRAUD ON THE COURT

Deutsche Lufthansa Aktiengesellschaft (“Lufthansa”) moves the Court to exercise its inherent powers to dismiss the Complaint because the Plaintiff has perpetrated a fraud on the Court. Plaintiff lied under oath, swore to false and misleading interrogatory responses, and withheld documents from production.

Lufthansa, in support of this motion, files herewith the following documents:

- Deposition of Cavour Ndam (July 5, 2022) (“Ndam Depo.”)
- Deposition of Angela I. Salcedo (July 7, 2022) (“Salcedo Depo.”)
- Declaration of Jonathan M. Stern (including Exhibits A-O)

For the foregoing reasons, and upon the entire record in this case, Lufthansa asks the Court to dismiss Plaintiff’s Complaint with prejudice.

Dated: July 20, 2022

Respectfully submitted,

DEUTSCHE LUFTHANSA AKTIENGESELLSCHAFT
By Counsel

SCHNADER HARRISON SEGAL & LEWIS LLP

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CERTIFICATE OF SERVICE

I hereby certify that I filed this Motion to Dismiss using the Court's ECF system on July 20, 2022, and that—according to the ECF system—this will effect service on:

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